

14. The apparatus of claim 13, wherein the swing arm is adapted to drive a load on an end of the swing arm that is remote from the coil.

1 15. The apparatus of claim 13, wherein

2 - the permanent magnets are sector shaped; and

3 - the apparatus further comprises a load to be driven by the swing arm, which load is  
4 outside the sector shaped magnets.

16. The apparatus of claim 1, wherein the permanent magnets are sector shaped.

#### REMARKS

The present application has been presented for continuing examination so that additional claims, commensurate with the scope of the disclosure, may be considered, as indicated above. All of the newly presented claims are considered to recite patentable distinctions over De Jager.

The finding of allowability of claim 8 in the final office action is gratefully acknowledged.

#### Art rejections

The art rejections of the final office action are respectfully traversed.

Art rejections: claim 1

Claim 1 recites, *inter alia*, a cage, which encloses the coil and the permanent magnets, as a closed magnetic return path. Advantages of this structure are explained, e.g., at page 1, lines 18-20 of the specification. Against this recitation, the Examiner cites the plates at 5 of de Jager. Applicant respectfully submits that these plates fail to teach or suggest either a "cage" or a "closed magnetic return path". They are simply two parallel plates. Accordingly, De Jager fails to teach or suggest independent claim 1.

Art rejections: claim 9

Claim 9 recites that the cage, on the side remote from the pivot, has a shielding wall having an opening in the area of the magnets.

The Examiner purports to find this limitation in element 25 of Hartman. Applicant is totally baffled by this assertion. In Hartman's Fig. 3, also reproduced on the cover of the patent, Applicant sees walls along the sides of the element 25 that are parallel to the elements pointed away from by reference numeral 9, i.e. these walls are parallel to the swing arm at its farthest extent of motion. The figures that Applicant has show the side of element 25 remote from the pivot, i.e. on the side pointed to by arrows 24 and 64, to be completely open. There is nothing coming up from the base of element 25 at all on this remote side.

It is possible that the Examiner is being fooled by an optical illusion. There is an Escher-like error in this drawing, which is highlighted in yellow on the enclosed enlarged copy of the bottom portion of figure 3. The non-raised back of the lower side of element 25 is shown by a dotted line through the opaque body of magnet 24. This non-raised back is pointed to by the new pink reference numeral 301 on the large copy. There is a stray line pointed to by new pink

reference numeral 302 on the large copy. It is not clear what this stray line represents, but it appears that the draftsman

- became confused in the middle of drawing line 301;
- forgot that the dotted line 301 represented the back of element 25;
- instead came to think that line 301 represented the bottom of magnet 24; and
- therefore drew a second line 302, which also attempted to show the non-raised back of element 25.<sup>1</sup>

Applicant respectfully submits that this drafting error fails to teach or suggest that there is a wall coming up from the back of the bottom of element 25.

Art rejections: claim 3

Claim 3 recites that the swing arm is secured to the coil and supported on a pivot. The pivot is arranged at the inner side of a sector shaped magnet. Against this recitation, the Examiner cites Hartman.

Applicant respectfully submits that Hartman and De Jaeger are in different fields, the one relating to a textile machine and the other relating to a disk drive. Accordingly it would not be obvious to combine them. Moreover the shape of the magnet in Hartman would not work with the double arm configuration of de Jager.

Accordingly, Applicant respectfully submits that the Examiner has failed to make a *prima facie* case against claim 3.

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<sup>1</sup> Another drafting error shows sector 62 pointed to with an arrow head, while sector 64 is inconsistently pointed to with a lead line without arrow head. Element 24, which represents the entire magnet piece, is the only element in this portion of the drawing that appropriately should have an arrowhead.

#### De Jager/Anna and Anna/DeJager combinations

Since De Jager is a part of a sewing machine & Anna is a part of a shaver, it would not be obvious to combine them.

Also, Anna refers to a "leaf" spring, while the application refers to a "blade" spring. It is not clear to the undersigned that these are the same things. If the Examiner has more information on this topic, the undersigned would be glad to see it.

In general, Anna concerns an arrangement for doubling the oscillating frequency. The overlap between the claimed invention, or the De Jager document, and Anna is not easy to see. In Anna, Applicant cannot find any coil movably supported by a swing arm or any cage. Accordingly, it does not seem that one of skill in the art would take a leaf spring that has, apparently, the effect of mechanical frequency doubling and build it into a different apparatus with only the effect of exerting a permanent return force.

#### Claims 10 and 11

These claims relate to the use of the invention in a shaver. Of all the references, only Anna appears to relate to a shaver, and, as has been seen above, Anna is rather remote from the invention.

Any other rejections would appear to be moot in view of the above.

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Applicant respectfully submits that he has answered each issue raised by the Examiner and that the application is accordingly in condition for allowance. Allowance is therefore respectfully requested.

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